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21 SEP 30 1999 MR. BRADSHAW: Good morning. Les Bradshaw, Nye  
22 County Department of Natural Resources and Federal Facilities,  
23 Pahrump, Nevada. 1210 East Basin Road.

24 We appreciate you folks coming to town. We've  
25 taken a preliminary look at the Draft EIS. It's 1,600 or so  
1 pages with another 30 to 40,000 pages of backup information.

1 2 Our preliminary review of the document indicates  
3 that it is deficient, legally insufficient or deficient in  
4 number of ways.

5 We call upon the DOE do redo parts of the draft  
6 and issue additional draft supplemental sections for additional  
7 comment on issues that are important to Nye County.

2 8 This document brings forth a vague description of  
9 a repository program which is designed to transport and store  
10 very, very dangerous material, material that other communities  
11 in this country don't want and which the nation -- or the  
12 Nuclear Waste Policy Act seems to be targeting to bring to this  
13 area.

14 On the issue of transportation, the EIS, as you  
15 can see from the maps around the room, describes a number of  
16 transportation corridors that are -- which you have -- you have  
17 described almost every public roadway that comes into Nye  
18 County.

3 19 Certainly the route - the routes that impact this  
20 community, the proposed rail route is vague. It's not defined.  
21 People can't take the document, read the document and  
22 understand where that route might be.

23 We have no ability to take that document and  
24 truly assess the environmental impacts of that -- of that

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25 proposed action because of the vagueness of the description of  
1 the program.

2 The document is lacking in giving specifics on  
3 timing, specific routes, the specific environmental impacts  
4 that might occur, the impact on this community, the  
5 socioeconomic impact.

4 6 It makes it impossible for anyone to truly take  
7 that document that you have produced and spent 27 million  
8 dollars more or less producing and making any realistic  
9 assessment.

10 In addition to the transportation issue, the  
11 document describes a repository that is not even designed to  
12 contain the nuclear waste, but in fact the design will allow  
13 the nuclear waste to escape the repository area, travel  
14 downgradient hydrologically through the town of Amargosa  
15 Valley.

16 The only question is the timing of that  
17 environmental degradation, the amount of radionuclide exposure  
18 that an individual in Amargosa Valley might be exposed to.

5 19 The models that were used to predict the  
20 safeness, so to speak, the safeness or let's say the risk has  
21 been subject to criticism on a national level by national peer  
22 review groups.

23 We suggest to you that the databases that were  
24 used to -- that were used in the regional hydrologic model are  
25 insufficient, legally insufficient and that additional data is

1 needed and that this would be one of the supplemental parts of

2 the EIS that would be reissued.

3 We have had a careful look at this document. We  
4 intend to keep looking at it, listening to the comments of the  
5 citizens in Nye County and the State of Nevada and nationwide  
6 to present our comments on this document and to present to you  
7 in final written form comments approved by the Nye County Board  
8 of Commissioners at the appropriate time.

9 We appreciate the fact that there is 180 day  
10 comment period. We are about one-fourth of the way through  
11 that now and we -- Nye County intends to submit additional  
12 comments.

6 13 In summary, we believe that the document fails to  
14 take into account the cumulative impacts of federal actions in  
15 Nye County, that your document fails to take into account the  
16 impacts of other federal agencies as is required by the CEQ  
17 guidelines.

9 18 Some of the models that were used to draw  
19 conclusions about risk or the safety considerations for the  
7 20 repository are ill founded, and that the transportation  
21 corridors, the issue which mostly affect -- which most affects  
22 our community, the community of Pahrump, Nevada is so vaguely  
23 defined that most citizens taking a look at that EIS document  
24 would not have the ability to understand the true impacts of the  
25 proposed action.

1 If -- you know, if you were to do that, and there  
2 are so many options that are described in those maps, so many  
3 ways to get nuclear waste here that we have to -- we have to  
4 assume that any route into Nye County, certainly any route that

5 heads up to gate 100 or gate 510 of the Nevada Test Site is  
6 likely to be used for nuclear waste materials.

8 7 Bear in mind there is an ongoing low level waste  
8 transportation program that has been happening for several  
9 decades and is slated to keep going for another ten -- another  
10 two to three decades, and you -- you overlap that with the  
11 proposed high-level nuclear waste transportation programs, and  
12 we suggest to you that -- that this document does not  
13 adequately take into effect the cumulative impacts on this  
14 county of federal actions.

15 Thank you.